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Attorneys for Defendant
TODD SHIPYARDS CORPORATION

BEFORE THE JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION

IN RE: ASBESTOS PRODUCTS LIABILITY) **MDL DOCKET NO. 875**
LITIGATION (NO. VI),)
This Document Relates to:)
SHIRLEY CRONIN et al. vs.)
TODD SHIPYARDS CORPORATION, et al.)

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SHIRLEY CRONIN, et al.,) CASE NO. CV 08-3274
Plaintiffs,)
vs.) **DEFENDANT TODD SHIPYARDS**
TODD SHIPYARDS CORPORATION,) **CORPORATION'S NOTICE OF TAG-**
GENERAL DYNAMICS CORPORATION,) **ALONG ACTION**
VIAD CORP., and HAYLEY HOTT,) Multi-District Rule 7.5(e)
Defendants.)

TO THE CLERK OF THE ABOVE-ENTITLED COURT, AND TO ALL PARTIES AND
THEIR ATTORNEYS OF RECORD:

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1 PLEASE TAKE NOTICE THAT on July 29, 1991, the Judicial Panel of Multi-District
2 Litigation entered an order transferring all asbestos cases pending in the federal courts to the United
3 States District Court, Eastern District of Pennsylvania, for coordinated or consolidated pretrial
4 proceedings pursuant to 28 U.S.C. §1207 ("MDL Transfer Order"). The MDL Transfer Order also
5 applies to "tag-along actions," which refers to a civil action pending in a District Court and involving
6 common questions of fact with actions previously transferred under Section 1407 by the Judicial
7 Panel of Multi-District Litigation pursuant to a January 17, 1991 Order to Show Cause. See Multi-
8 District Litigation Rules ("MDL Rules"), Rule 11.

9 Pursuant to MDL Rule 7.5(c),

10 Any party or counsel in actions previously transferred under Section
11 1407 or under consideration by the Panel for transfer under Section
12 1407 shall notify the Clerk of the Panel of any potential "tag-along
actions" in which that party is also named or in which that counsel
appears.

13 Defendant Todd Shipyards Corporation hereby notifies the Court that the above-entitled
14 action involves all or a material part of the same subject matter as another action which is pending
15 in another federal court. Accordingly, the above-entitled action is considered a "tag-along action,"
16 subject to transfer to the United States District Court for the Eastern District of Pennsylvania,
17 because the action involves alleged injuries due to exposure to asbestos. The Clerk of the Panel may
18 either (1) enter a conditional transfer pursuant to MDL Rule 7.4(a) or (2) file an order to show cause
19 why this action should not be transferred pursuant to MDL Rule 7.5(b).

20 DATED: August 4, 2008

YARON & ASSOCIATES

21 By: _____
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GEORGE D. YARON
KEITH E. PATTERSON
JOSHUA D. WHITE
Attorneys for Defendant
TODD SHIPYARDS CORPORATION

1 PROOF OF SERVICE

2 I am over 18 years of age and not a party to the within action. I am employed in the County
3 of San Francisco; my business address is Yaron & Associates, 601 California St., 21st Floor, San
4 Francisco, California 94108-2826.

5 On **August 4, 2008**, I served the within:

6 **DEFENDANT TODD SHIPYARDS CORPORATION'S NOTICE OF TAG-
7 ALONG ACTION**

8 on all parties in this action as listed by ECF

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10 
11 **VIA ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically on
12 designated recipients through PACER. Upon completion of electronic transmission of
13 said document(s), a receipt is issued to serving party acknowledging receipt by PACER's
14 system. Once PACER has served all designated recipients, proof of electronic service is
15 returned to the filing party which will be maintained with the original document(s) in our
16 office. This service complies with CCP §101.6.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct, and that this declaration was executed on **August 4, 2008**, at San Francisco,
19 California.

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21 MARISELA H. NAVARRO

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